TRANSPARENCY RECORD

Ministry for Cities, Environment, Regions & Transport

Absence of Infrastructure Analysis in the Head Start Local Government Reorganisation Process

LGOIA 2627-0002 | Response dated 4 August 2026

1. Purpose of this Record

This document records the formal Official Information Act response from the Ministry for Cities, Environment, Regions and Transport (MCERT) to a request concerning infrastructure analysis, comparative investment-versus-retreat assessments, and related risk advice in the context of the Head Start local government reorganisation proposals.

It is published as a primary-source transparency record. It sits alongside the National Pattern and Drivers Analysis, the Te Waihanga Admission, and other formal responses confirming the absence of detailed comparative infrastructure analysis at central and local levels.

2. The Request

The request, transferred to MCERT on 6 July 2026, sought:

1. Any analysis, advice, briefings or reports held regarding the condition, capacity, maintenance backlogs or renewal requirements of stormwater, drainage, flood protection and river management infrastructure in areas covered by the Head Start proposals (particularly Hamilton City Council and surrounding areas).
2. Any assessment or modelling on how the proposed reorganisation options would affect protected or ring-fenced renewal funding streams for critical flood and stormwater infrastructure, and the comparative costs and long-term outcomes of infrastructure investment versus managed retreat or minimum intervention approaches in flood-prone areas.
3. Any risk assessments, infrastructure implications papers or advice considering recent flood events (including the King’s Birthday weekend 2026 event) or the findings of Te Waihanga’s National Infrastructure Plan 2026 in relation to the Head Start proposals.
4. Any internal working documents, correspondence or advice received from Te Waihanga, the Office of the Auditor-General, Waikato Regional Council or external consultants regarding asset management, infrastructure funding gaps or flood risk in the context of the Head Start discussions.

3. The Ministry’s Formal Response

Key statements:

- Head Start proposals are due to the Ministry on 9 August 2026. At the date of the response, none had been received.
- Therefore the Ministry does not hold information within the scope of the request.
- Once proposals are received, they are “expected to be high level in nature and therefore may not contain the specific information requested.”
- Head Start proposals that are agreed by the Government will undergo a six-month detailed design phase.

Formal refusal

The request was refused in full under:

- Section 18(e) – the document alleged to contain the information requested does not exist or, despite reasonable efforts to locate it, cannot be found; and
- Section 18(g) – the information requested is not held by the Ministry, and it has no grounds to believe that the information is connected more closely with the functions of or is held by another department.

4. What This Record Establishes

This response establishes, in writing from the central agency responsible for the Head Start process:

- That at the point proposals are due, the Ministry holds no analysis of the condition, capacity, maintenance backlogs or renewal requirements of stormwater, drainage, flood protection or river management infrastructure in the relevant areas.
- That the Ministry holds no assessment or modelling of how reorganisation options would affect ring-fenced renewal funding streams or the comparative costs and outcomes of infrastructure investment versus managed retreat.
- That the Ministry holds no risk assessments or infrastructure implications papers linking recent flood events or Te Waihanga's National Infrastructure Plan 2026 to the Head Start proposals.
- That incoming proposals are expected to be high-level and unlikely to contain the specific infrastructure and comparative analysis sought.
- That any more detailed consideration would only occur later, during a post-agreement six-month detailed design phase.

5. Context

The Head Start process is part of the Government's simplifying local government programme. Reorganisation proposals affect the future structure, funding and responsibilities of councils, including those responsible for flood protection, stormwater and river management assets.

This formal response confirms that, at the stage proposals are being received by the central agency, no detailed infrastructure condition analysis, comparative investment-versus-retreat assessment, or risk advice linking recent flood events or the National Infrastructure Plan has been held or prepared in relation to the Head Start process. It is consistent with a wider pattern of formal responses showing the absence of such comparative analysis at both central and local levels.

6. What This Record Does Not Establish

- That the Head Start process is improper or that reorganisation should not proceed.
- That detailed infrastructure analysis will never be undertaken (the response notes a later detailed design phase for any agreed proposals).
- That the information must exist elsewhere and is being withheld. The Ministry has stated that it does not hold the information and that proposals had not yet been received.

7. Public Interest

Where the central agency managing a local government reorganisation process confirms that it holds no analysis of critical flood and stormwater infrastructure condition, no comparative assessment of investment versus managed retreat pathways, and no risk advice linking recent flood events or the National Infrastructure Plan to the proposals under consideration, that confirmation is a matter of public interest.

This record is published so that the Ministry's formal statement sits on the public record alongside the National Pattern and Drivers Analysis, the Te Waihanga Admission, and related independent documentation of infrastructure analysis gaps.

8. Source Document

Letter from Sam Miles, Policy Manager – Simplifying Local Government, Ministry for Cities, Environment, Regions and Transport, dated 4 August 2026, responding to Official Information Act request LGOIA 2627-0002 (transferred from the Department of Internal Affairs Local Government branch on 6 July 2026).

Related records: National Pattern and Drivers Analysis; Te Waihanga Admission (OIA26-TW16); MCERT Co-Governance Transparency Record (LGOIA 2627-0001); Hamilton and other regional engineering scrutiny packs (2026).

— End of Record —

Independent researcher | Public interest documentation | August 2026